

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION AT MEMPHIS

MARILYN DONALD and CHARLES  
DONALD,

*Plaintiffs,*

v.

FLOYD BONNER, Jr., *et al.*

*Defendants.*

Case No. 2:23-cv-02738-TLP-atc

**JURY DEMAND**

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**NOTICE OF DEPOSITION OF LIEUTENANT FILMORE VARNER**

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**I. NOTICE**

This filing shall serve as NOTICE by the Plaintiffs in this action, Marylyn Donald and Charles Donald, to take the DEPOSITION, through undersigned counsel, of Defendant Lt. Filmore Varner, on **May 29, 2024**, at **10:00 AM**, as undersigned counsel agreed with counsel for Lt. Varner prior to the filing of this notice. The deposition will convene at the law offices of APPERSON CRUMP, PLC, located at 6000 Poplar Avenue, Suite 150, Memphis Tennessee 38119, or at such other location as the parties may agree. Counsel intends to depose Lt. Varner concerning all non-privileged information he may have relevant to the issues in this action. The deposition will be recorded by stenographic means and continue from day to day until complete. Unless otherwise stipulated to on the record, the deposition will adhere to and be governed by the Rules 26(b) and 30 of the Federal Rules of Civil Procedure in all respects.

Dated May 23, 2024.

Respectfully submitted,

/s/ Jacob Webster Brown

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## II. CERTIFICATE OF SERVICE

I certify that a true and exact copy of this notice is filed May 23, 2024 via the District Court's electronic-filing system, and all counsel of record will be automatically served by operation of the same.

/s/ Jacob Webster Brown